

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SWIFT STAFFING HOLDINGS, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 18-10616-JDW**

**MOTION FOR JOINT ADMINISTRATION**

COMES NOW Swift Staffing Holdings, LLC (the “Movant”), and files this its Motion for Joint Administration and in support thereof would respectfully show as follows, to-wit:

1. This case was initiated by the filing of a voluntary petition (the “Petition”) pursuant to Chapter 11 of the Bankruptcy Code on the 21<sup>st</sup> day of February, 2018. Subsequent thereto, Movant has been, and is, the duly qualified, and acting, debtor-in-possession in this Chapter 11 case.

2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. § 157 and 1334; 11 U.S.C. § 105, 363, 541, 1107, related statutes, related rules and various orders of reference. This is a core proceeding.

3. Debtor Swift Staffing Holdings, LLC is the owner of several entities that have also filed Chapter 11 cases: Swift Staffing Arkansas, LLC (Case No. 18-10626-JDW), Swift Staffing Alabama, LLC (Case No. 18-10627-JDW), Swift Staffing Georgia, LLC (Case No. 18-10628-JDW), Swift Staffing North Carolina, LLC (Case No. 18-10629-JDW), Swift Staffing Florida, LLC (Case No. 18-10630-JDW), Swift Staffing Mississippi, LLC (Case No. 18-10631-JDW), Swift Staffing Tennessee, LLC (Case No. 18-10632-JDW), Swift Staffing Pennsylvania, LLC (Case No. 18-10633-JDW), and Rockhill Staffing Texas, LLC (Case No. 18-10634-JDW). Swift Staffing Holdings, LLC will hereinafter be referred to as the “Lead Case”.

4. There are sufficient common areas of administration in these cases that justify the Court entering an order consolidating the cases for administrative purposes.

5. The benefits and efficiencies of joint administration of these cases significantly outweigh the administration of these cases as “separate” cases that have not been consolidated for administrative purposes.

6. Movant suggests that the Lead Case and the Affiliates should be administratively consolidated with and “into” the Lead Case of Swift Staffing Holdings, LLC, Case No. 18-10616-JDW because, in part, that case was the first filed case of the cases involved in this Motion and because the Debtor in that case owns all of the Affiliates.

7. Accordingly, in the event the Court sees fit to grant the Motion, the bankruptcy cases of Swift Staffing Arkansas, LLC (Case No. 18-10626-JDW), Swift Staffing Alabama, LLC (Case No. 18-10627-JDW), Swift Staffing Georgia, LLC (Case No. 18-10628-JDW), Swift Staffing North Carolina, LLC (Case No. 18-10629-JDW), Swift Staffing Florida, LLC (Case No. 18-10630-JDW), Swift Staffing Mississippi, LLC (Case No. 18-10631-JDW), Swift Staffing Tennessee, LLC (Case No. 18-10632-JDW), Swift Staffing Pennsylvania, LLC (Case No. 18-10633-JDW), and Rockhill Staffing Texas, LLC (Case No. 18-10634-JDW) shall be administratively consolidated with, and into Swift Staffing Holdings, LLC (Case No. 18-10616-JDW).

8. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order granting the Motion. The Debtor prays for general relief.

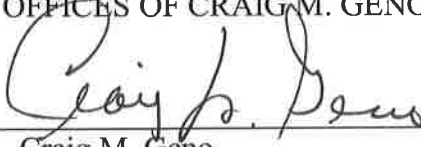
This, the 23<sup>rd</sup> day of February, 2018.

Respectfully submitted,

SWIFT STAFFING HOLDINGS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By   
Craig M. Geno

OF COUNSEL:

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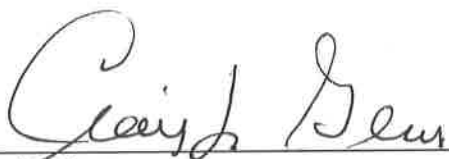
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.  
[Sammye.S.Tharp@usdoj.gov](mailto:Sammye.S.Tharp@usdoj.gov)

THIS, the 23<sup>rd</sup> day of February, 2018.

  
Craig M. Geno